

State of New Jersey

Chris Christie

Governor

Kim Guadagno

Lt. Governor

Office of the Attorney General
Department of Law and Public Safety
Division of Gaming Enforcement
1300 Atlantic Avenue
Atlantic City, NJ 08401

Jeffrey S. Chiesa Attorney General

David Rebuck

Director

February 7, 2012

N. Lynne Hughes, Esq. Vice President Legal Affairs & Chief Legal Officer Caesars Entertainment, Eastern Division c/o Bally's Atlantic City Park Place and the Boardwalk Atlantic City, NJ 08401

Dear Ms. Hughes:

The staff of the Division of Gaming Enforcement's Regulatory Enforcement Bureau has reviewed Petition # 0311201 filed by Harrah's Atlantic City Operating Company, LLC (Harrah's) dated January 31, 2012. Harrah's is seeking approval to amend its Certificate of Operation to reflect a reduction of the casino floor by walling off a portion of its gaming floor in Slot Zone B to be used as a gaming storage area and reconfigure certain slot zones.

Harrah's is currently operating under a Certificate of Operation, which was approved in Petition # 3361101 (PCO-59) on December 22, 2011, by the Division of Gaming Enforcement.

By Petition # 0311201, Harrah's seeks approval to complete modifications to its casino room, as depicted on PCO-60, dated January 4, 2012, and revised January 19, 2012, Project # 1103.18 prepared by Michael Demling Associates, License #08676.



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The petitioner proposes the following:

PCO-60

- 1. Slot Zone B Remove eighty-two (82) slot machines and stools, add two (2) slot machines and stools and renumber slot machines.
- 2. Slot Zone D Remove one (1) slot machine and stool.

The summary of the statistical calculations is as follows:

- 1. A decrease of eighty-one (81) slot machines and eighty-one (81) slot stools. The total number of slot machines is **2,793**.
- 2. The total number of table games will remain at **205** table games.
- 3. The gaming area has changed with a decrease of **1,978** sq. ft. for a new total of **178,344** sq. ft. (**177,775** sq. ft. casino area and **569** sq. ft. casino simulcast area.)
- 4. The allowable slot coverage (90% of 178,344 ft.) is **160,510** ft.
- 5. The actual slot coverage is **104,150** sq. ft., which is **58.00%** of the total gaming area and within the allowable 90% for slot density.

The petitioner has requested approval to wall off a portion of its gaming floor in Slot Zone B and convert it into a gaming storage area. Petitioner has indicated that the proposed wall will be installed floor to ceiling and the gaming storage area behind the wall will be accessed via two (2) doors, both of which will be secured by lock and key maintained by the slot performance department and alarmed to the surveillance department.

Based on the Division's authority, the requested amendments to the Harrah's Certificate of Operation as set forth above, are hereby granted pursuant to <u>N.J.A.C.</u> 13:69C7.3, et seq. This approval authorizes a casino room containing and consisting of **178,344** square feet of total gaming space, **205** table games, **2,793** slot machines and slot stools, **1** Keno booth with **3** terminals, **23** gaming voucher redemption machines and **4** Self Service Pari-Mutuel Machines (STANS) as referenced in the Petitioners letter.

Please note that although the blueprint depicts areas of the gaming floor as smoking and nonsmoking, the designation of smoking areas in casinos is subject to the jurisdiction of the NJ Department of Health and Senior Services and the Atlantic City Department of Health and Human Services, not the Division. Accordingly, this letter should in no way be construed as approving areas of the gaming floor for smoking.

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This approval is subject to the following conditions:

- A. The revised operational blueprint (PCO-60), reflecting the changes approved herein, inclusive of any deficiencies noted, be submitted to the Division's Regulatory Enforcement Bureau, casino licensee's security podium and the casino licensee's CCTV monitoring room;
- B. All steps necessary and appropriate to ensure maximum patron comfort and safety during the period of renovation are taken;
- C. The procedures detailed in the Slot Procedures Manual are followed during the movement of slot machines;
 - D. A revised Slot Master List is submitted to the Division;
- E. Harrah's notifies the Division immediately in the event of any modification to the approvals granted herein;
- F. Harrah's comply with all requirements and conditions appended to approvals received from all involved agencies of government whose approvals are required in order for a Certificate of Occupancy for the general public to be issued including, but not limited to, the Department of Community Affairs and the local construction official;
 - G. That CCTV coverage will be maintained over the slot storage area; and,
- H. Once modifications have been completed, a satisfactory inspection and approval by the Division is required to ensure the changes made conform to the petition. The review also includes but is not limited to, an assessment of the adequacy of CCTV and security coverage. Such inspection must be done **prior to the proposed areas being used for slot storage or gaming activity**.

To schedule an inspection, please contact the Division at inspections@njdge.org

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If you have any questions, please do not hesitate to contact Bill Kendzierskil at 441-7557.

Sincerely,

Don Errera, Deputy Chief Regulatory Enforcement Bureau

cc RSH/ File DGE Intake Chuck Kimmel, DAG C-12-12-001